SYNTEX Property

July 23, 1993

Mr. Bob Feild
Superfund Program
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

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RE.

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Re: Implementation Plan Modification to Construct an Interim Drummed Waste Storage Building

Syntex Agribusiness, Inc., Verona, Missouri Facility

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40027884 SUPERFUND RECORDS

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Dear Bob:

This letter confirms our July 19,1993 telephone conversation and my June 22 and 25, 1993 telephone conversations with Mark Bogina regarding construction of a drum storage building at the Verona site, which will be constructed under the following modification to the Verona Facility Implementation Plan.

The building serves two main purposes: (1) to eliminate handling and treatment of rainwater inside the Photolysis dike; and (2) to reduce the cost of maintaining the drums and equipment. Eliminating the rainwater management problem, by enclosing the Photolysis dike, will allow this structure to be dewatered and available for any future decontamination work. Further, storing the drums in a protected environment will greatly reduce deterioration of the drums when exposed to the weather. Gaining control over both activities will simplify maintenance and also greatly reduce maintenance costs.

Approximately 650 drums are currently being stored, which contain solids such as decontamination debris, sludges, personnel protective equipment (PPE), small metal parts from the Photolysis process, plastic pipe, pails, samples, etc. All of these materials were generated by taking the equipment out of service (decommissioning), decontamination of the NEPACCO/Photolysis equipment and subsequent maintenance of these materials and the equipment over the past three years. None of the drums contain liquids. All drummed liquids are contained in the T-9 building.

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Two attachments are submitted with this letter: (1) Attachment 1--a site map showing the location of the building in relation to other significant features in the immediate vicinity; and (2) Attachment 2--a foundation plan for the building. As discussed, please note the following regarding construction and use of the building:

- ▶ The building is planned for the storage of the drums for an indefinite period, while a final plan for their disposition is decided. If the drums are to be managed on a long-term basis in another on-site facility or disposed off-site, this building will be decontaminated and taken out of service as a waste storage building.
- ► The storage building will be constructed to comply with all substantive requirements under the Resource Conservation and Recovery Act, as amended, for storage of containerized, nonliquid hazardous wastes.
- No liquids are being stored inside, therefore, no spills are expected. Nevertheless, the slab will have a 4 inch curb and the floor will be sloped toward two, non-penetrating sumps that are approximately 2 inches deep. The non-penetrating feature of the sumps will facilitate removal of any water that may enter the building, without creating a potential route for leakage to the subsurface.
- ▶ No flammable materials are being stored inside, therefore, no fire protection is planned; however, a water main connection will be stubbed into the foundation to accommodate other future uses of the building following decommissioning.
- ▶ All work activity will be in accordance with the Health and Safety Plan for the site (Appendix 4-Verona Implementation Plan). It is important to note that the specific location of the planned construction is not one of the five subsites nor will it encroach into any of the subsites, and the levels of dioxin in the construction area (as determined in the Grid Area sampling) are below 1 ppb. (See Grid Area samples #205, #204, #194.)
- ▶ A 6-foot wide by 4-inch base of crushed rock will be placed around the foundation for vehicle and equipment access.
- ▶ Excess soil generated during construction will be used as fill under the foundation of the building. No soil or other material will require offsite management for construction of the storage building.

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► Following closure (including decontamination), the building will be transferred to Verona plant management for other possible uses. No plant activities of any kind will be permitted while wastes are being stored in the building.

► Construction will be completed within 30 days following completion of the foundation, weather permitting.

▶ The construction will not disturb or encroach upon the capped portion of the Spray Irrigation or inside the Spill Area.

Syntex proposes to modify the Verona Facility Implementation Plan, as set forth above, for construction of the building. Please respond at your earliest convenience.

SYNTEX AGRIBUSINESS, INC.

Gary L. Smythe, P.E.

Administrator, Environmental Projects

Attachments

cc (w/attachments):

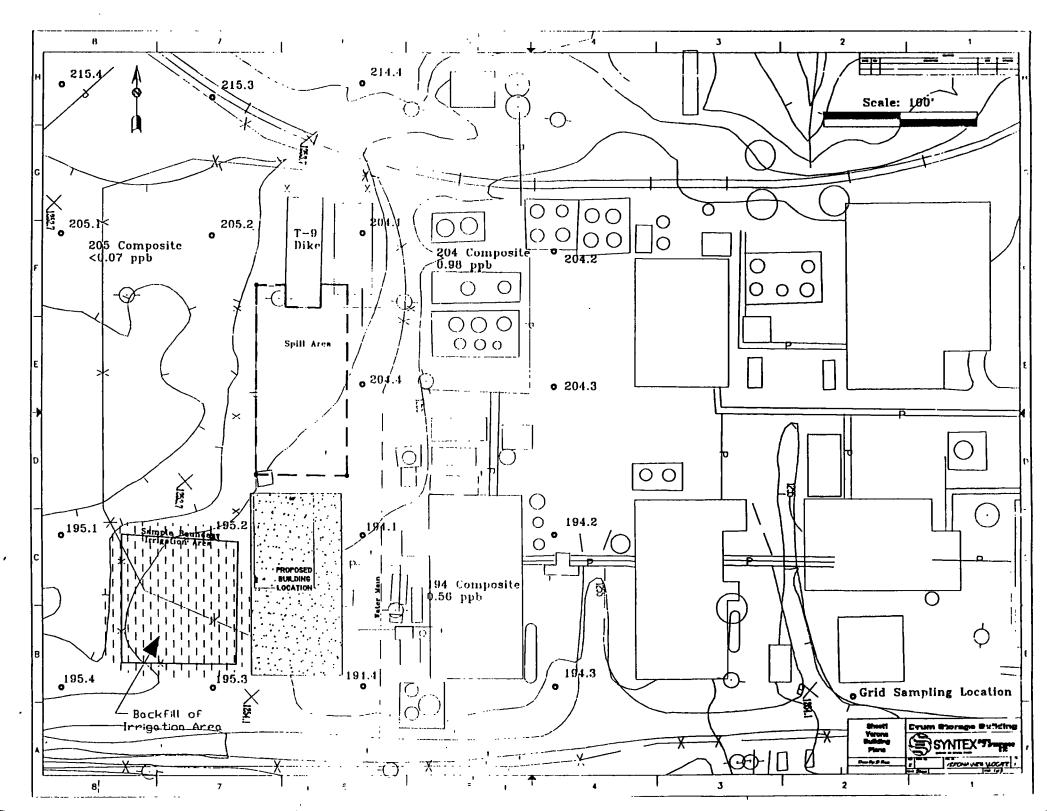
Mr. Gary J. Pendergrass, Syntex

Mr. James H. Long, MDNR

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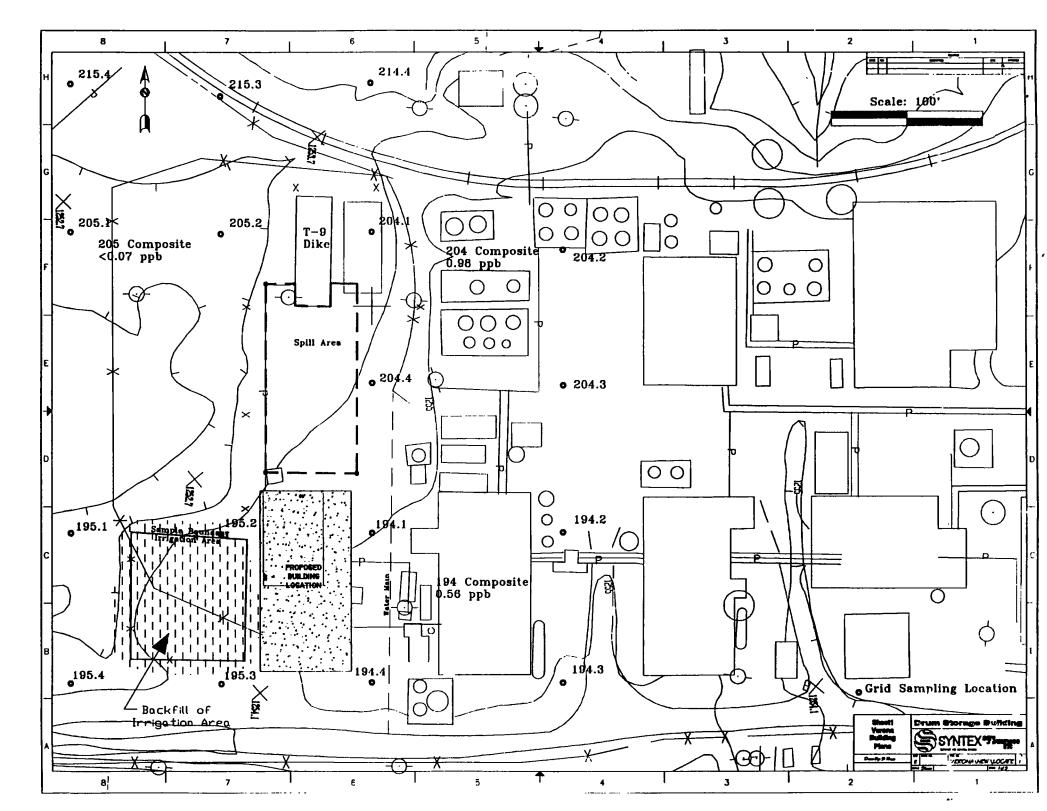
ATTACHMENT 1

BUILDING LOCATION PLAN



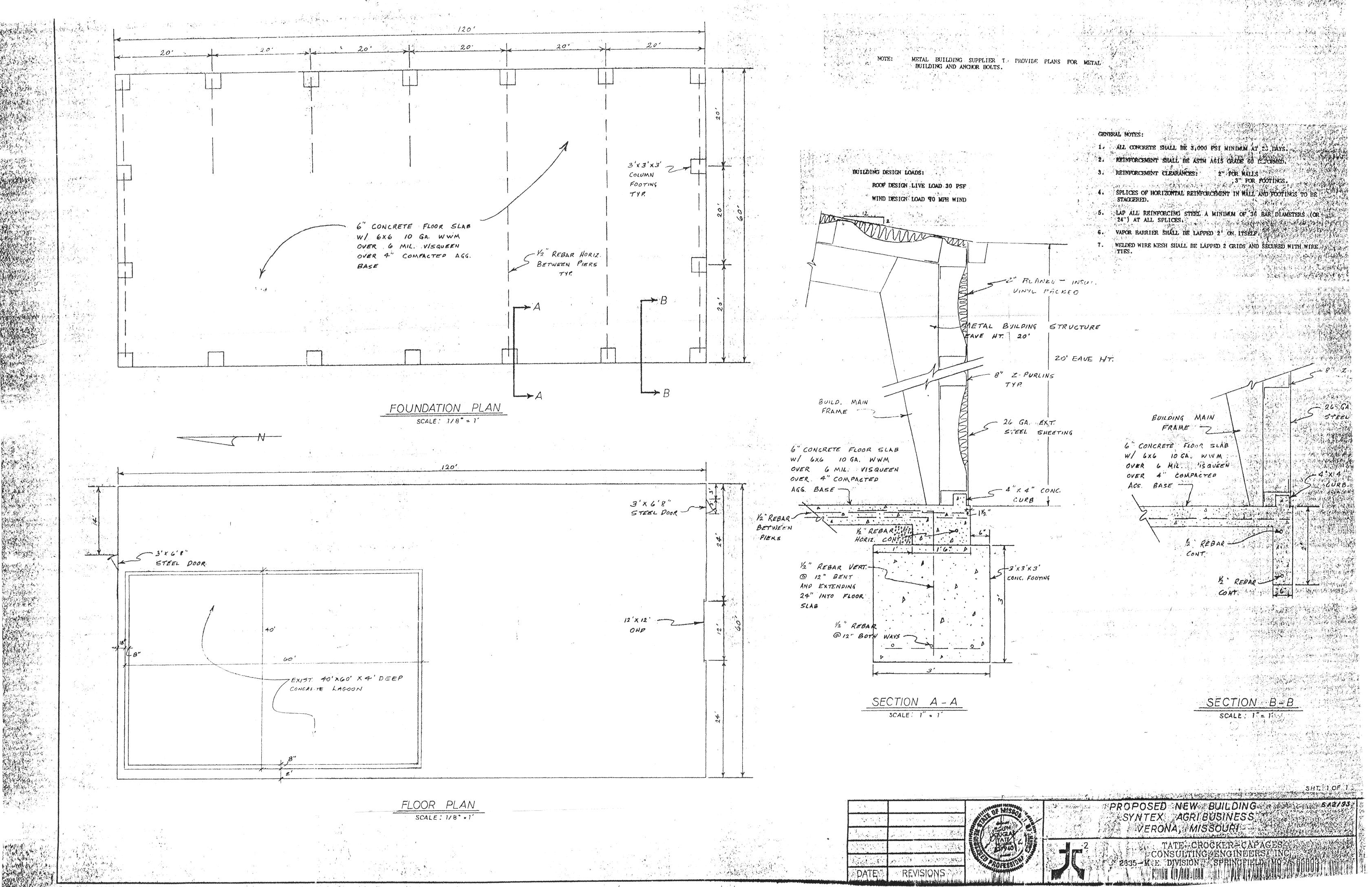
ATTACHMENT 1

BUILDING LOCATION PLAN



ATTACHMENT 2

FOUNDATION PLAN



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